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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Keith Raniere,

Plaintiff,

-against-

Merrick Garland, et al.,

Defendants.

Case No. 4:22-cv-00561-RCC

**MOTION TO REQUEST EXTENSION OF DEADLINE  
TO FILE RESPONSE IN OPPOSITION TO  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

1. Plaintiff Keith Raniere, through his undersigned counsel, hereby moves to request the Court for an order granting a reasonable extension of the deadline to submit a Response in Opposition to Defendants' Motion for Summary Judgment related to the above-captioned case, which is currently due on October 16, 2023, to November 16, 2023 or any date thereafter that the Court deems acceptable.

2. Mr. Raniere's incarceration poses logistical challenges to enable him to easily participate with our office in the drafting of his response. To that end, although we have attempted to contact Mr. Raniere to discuss a draft of our Response, we have found it very difficult to reach and communicate with our client, and, as such, we have not yet had an opportunity to discuss its

contents in its entirety with him. We feel it is imperative to do so before filing. As such, we are requesting an additional adjournment to file our Response.

3. This extension is sought to afford additional time for the undersigned counsel to engage in further consultation with Plaintiff regarding the filing of his Response. Although this is the third request by the undersigned counsel on behalf of Plaintiff for an extension to file a Response in Opposition to Defendants' Motion for Summary Judgment, we feel it necessary considering his current circumstances and the difficulties they pose to facilitating attorney-client communication. Currently, Mr. Raniere has been on lockdown for over a week and we have not been able to communicate with him at all. Once the lockdown is lifted, we will be able to communicate with him. Therefore, the undersigned counsel respectfully requests the Court for a reasonable extension to file the Response.

4. Based on the foregoing, Plaintiff respectfully requests the date to file his Response in Opposition to Defendants' Motion for Summary Judgment be extended to November 16, 2023, or any date thereafter that the Court deems convenient.

Date: October 13, 2023

Respectfully submitted,

/s/ Arthur L. Aidala  
Arthur L. Aidala, Esq.  
Attorney for Plaintiff

Delivered via ECF  
to all Registered Parties